

**AMERICAN ARBITRATION ASSOCIATION
COMMERCIAL ARBITRATION RULES
DEMAND FOR ARBITRATION**

MEDIATION is a nonbinding process. The mediator assists the parties in working out a solution that is acceptable to them. If you would like the AAA to contact the other parties to determine whether they wish to mediate this matter, please check this box.

There is no additional administrative fee for this service.

TO: Name Dunhill Franchise Trust		Name of Representative (if known) Robert L. Purvin, Jr.		Name of Firm (if applicable)	
Address		Representative's Address P.O. Box 81887			
City	State	Zip Code	City San Diego	State CA	Zip Code 92138
Phone No.	Fax No.	Phone No. (619) 209-3775	Fax No. (619) 209-3777		

The named claimant, a party to an arbitration agreement contained in a written contract, dated See Exhibit B attached, providing for arbitration under the Commercial Arbitration Rules of the American Arbitration Association, hereby demands arbitration thereunder.

IS THIS A DISPUTE BETWEEN A BUSINESS AND A CONSUMER? Yes No

THE NATURE OF THE DISPUTE

Breach of contract based on unpaid royalties and related claims.

THE CLAIM OR RELIEF SOUGHT (the Amount, if Any)

See Exhibit A attached for description of claims and identification of all respondents.

DOES THIS DISPUTE ARISE OUT OF AN EMPLOYMENT RELATIONSHIP? Yes No

IF THIS DISPUTE ARISES OUT OF AN EMPLOYMENT RELATIONSHIP, WHAT WAS/IS THE EMPLOYEE'S ANNUAL WAGE RANGE? Note: this question is required by California law.

Less Than \$100,000 \$100,000 - \$250,000 Over \$250,000

TYPES OF BUSINESS

Claimant Employment Staffing Respondent Dunhill franchisee

HEARING LOCALE REQUESTED

You are hereby notified that copies of our arbitration agreement and this demand are being filed with the American Arbitration Association at its New York office, with a request that it commence administration of the arbitration. Under the rules, you may file an answering statement within fifteen days after notice from the AAA.

Signature (may be signed by a representative)		Title Attorney		Date 6/23/04
Name of Claimant Dunhill Staffing Systems, Inc.	Name of Representative Jeffrey H. Wolf		Name of Firm (if Applicable) Greenberg Traurig, LLP	
Address (to Be Used in Connection with This Case)		Representative's Address 2375 E. Camelback Rd., Ste. 700		
City	State	Zip Code	City Phoenix	State AZ
Phone No.	Fax No.	Phone No. (602) 445-8410	Fax No. (602) 445-8100	

TO BEGIN PROCEEDINGS, PLEASE SEND TWO COPIES OF THIS DEMAND AND THE ARBITRATION AGREEMENT, WITH THE FILING FEE AS PROVIDED FOR IN THE RULES, TO THE AAA. SEND THE ORIGINAL DEMAND TO THE RESPONDENT.

EXHIBIT A
Demand for Arbitration

Dunhill Staffing Systems, Inc. demands arbitration for disputes with the Dunhill Franchisees Trust (consisting of 18 franchisees) and others. Below is the list of those franchisees that are part of the Dunhill Franchisees Trust. Also listed are those individual franchisees who Dunhill demands arbitration against.

Claims Legend:

- (A) Unpaid Royalties/amount excludes penalties, interest, or 1% National Advertising
- (B) Trademark infringement
- (C) Breach of restrictive covenant (possibly in competition)
- (D) Non-submission or possible underreporting of royalties
- (E) Refusal of audit or insufficient audit information supplied
- (F) Unpaid notes receivable

Dunhill Franchisees Trust:

Franchisee	Claims:
Harvey Auger P.O. Box 78648 Charlotte, NC 28271-7037	D
Lelia and Jay Babson 975 Walnut Street Suite 260 Cary, NC 27511-4268	A
Mark Zorof P.O. Box 4165 Alpharetta, GA 30023	A, D
Marsha Simpkins P.O. Box 547 Charleston, WV 25322-0547	A, D, E
Michael Green 4015 Executive Park Drive, #240 Cincinnati, OH 45241-4017	B, C, D
Jess Montalvo 4455 S. Padre Island Drive, #102 Corpus Christi, TX 78411-5101	A, C, D
Bud Westover P.O. Box 24297 Forth Worth, TX 76124	C, D
Duke Haynie, CPC 96 Villa Road Greenville, SC 29615-3052	D
Michael Lamanna 15375 Barranca Parkway, Ste. K-104	D, F

Irvine, CA 92618	
Mark Lickteig 801 E. 20 th Street Joplin, MO 64804-8219	D
John Tierney 3732 Mt. Diablo Blvd, #375 Lafayette, CA 94549-3605	A
Elaine and Ron Gregory P.O. Box 196893 Winter Springs, FL 32719-6893	A
James S. Gunnin P.O.Box 1119 Rockport, TX 78381	D
Curtis Reid 7666 East 61 st Suite 120 Tulsa, OK 74133	D
Anthony Desiderio, CPC 49 South Main Street Pittston, PA 18640	A, C
Tony and Karen Russo 46 E. Trenton Avenue Yardley, PA 19067	B, C, D, E
Fran Boruff P.O. Box 488 Niwot, CO 80544-0488	C, D
Elias Zinn and Michael Wilcoxson 11259 SW Freeway Houston, TX 77031	D

Individual Franchisees:

David Bontempo 801 West Street Road Feasterville, PA 19053-7335	C, D
Neil Whitman 1470 Ben Sawyer Blvd, #16 Mt. Pleasant, SC 29464	D
Robert Bahr 206A Main Street Festus, MO 63028-1907	A, D, F
Joseph Lawless, CPC 775 Park Avenue, Suite 200-1 Huntington, NY 11743-3990	C, D
Robert Morris 41 Mohegan Lane	B, C, D

Rye Brook, NY 10573-1431	
Peter Kramer P.O. Box 48884 Tampa, FL 33647	B, C, D
Willie Miska 1415 Queen Anne Road Suite 202 Teanect, NJ 07666-3521	A, B, C, D, E
Richard Hanson 770 East Market Street Suite 185 West Chester, PA 19382	D, E